

**PLAINTIFF’S PRE-HEARING MEMORANDUM OF LAW IN SUPPORT OF
PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION**

EXHIBIT INDEX

Exhibit No.	Description
Declaration of Gabriel Gillett Exhibits	
1	September 4, 2017 email from Jesse Raasch to Lixin Sun re: Resume (translated)
2	Screenshot of a Facebook post from Matt Hoppes, dated September 1, 2016
3	June 26, 2019 email from Josh Wentworth to Jeff Brown re: Sandhills Wireless in Huawei Unit
4	Baicells’s PLMN Migration PowerPoint Presentation
5	March 3, 2020 email from Rick Harnish to Jon Truell email re: We Have Our Own HNI
6	September 12, 2019 email from Bo Wei to Tom Goode, et al, re: Baicells’ Plan on PLMN Migration
7	Baicells’s PLMN Migration Updated PowerPoint Presentation
8	Baicells’s August 7, 2019 PLMN Migration Plan for Cloud EPC in NA
9	July 9, 2019 email from Ronald Mao to Andy Yang re: PLMN Conflict with NA CloudCore
10	July 22, 2019 email from Jesse Raasch to Chad Murrish, et al., re: Baicells-Application for HNI
11	November 6, 2019 PowerPoint titled “Discussion of Baicells Migration Plan: IOC Virtual Meeting”
12	Baicells’s PLMN Migration Updated PowerPoint Presentation
13	September 6, 2016 email from Jesse Raasch to Rick Harnish, et al., re: Technical Issue
14	Baicells’s PLMN Migration PowerPoint Presentation
15	PLMN-ID Survey Report: Full List of PLMN ID in United States
16	July 9, 2019 email from Andy Yang to Jesse Raasch re: [Baicells Technologies] “US Support Team (Level 1)” Assignment LigTel MCC/MNC Issue
17	July 8, 2019 email from Sam Tetherow to Randy Mead re LigTel HNI Code

18	Baicells's Responses to LigTel's First Set of Interrogatories, dated March 24, 2020
19	August 21, 2019 email from Bo Wei to Natalie McNamer (ATIS) re: Use of HNI 310-90(0)
20	Printouts from Baicells's public website, taken on January 12, 2020
Declaration of Randy Mead Exhibits	
1	iconectiv IMSI, FAQ webpage, https://imsiadmin.com/faq (last accessed March 25, 2020)
2	IMSI Assignment and Management Guidelines and Procedures ("IMSI Guidelines") (Aug. 2018), https://www.atis.org/01_committforums/ioc/docs/IMSI-Guidelines-v15.1.1.pdf
3	November 7, 2011 Letter from Telcordia d/b/a iconectiv Confirming LigTel's HNI Code Assignment
4	LigTel's Proof of Annual Maintenance Payments for HNI Code
5	LigTel's Cybersecurity Policies No. 1
6	LigTel's Cybersecurity Policies No. 2
7	LigTel Employee Confidentiality Agreements
8	Non-Disclosure Agreements between Huawei and LigTel (2010)
9	February 23, 2020 Email to Mead re 3GPP HNI Guidelines (with the standards attached)
10	Screenshot of Baicells's Website stating it is 3GPP Compliant (publicly available online)
11	Non-Disclosure Agreement between Huawei and LigTel (2011)
12	August 21, 2019 Letter LigTel sent to Goode at ATIS re Baicells's Use of LigTel HNI Code
Declaration of Joshua Wentworth Exhibits	
1	IMSI Assignment and Management Guidelines and Procedures ("IMSI Guidelines") (Aug. 2018), https://www.atis.org/01_committ_forums/ioc/docs/IMSI-Guidelines-v15.1.1.pdf .
2	November 7, 2011 Letter from Telcordia d/b/a iconectiv Confirming LigTel's HNI Code Assignment
3	LigTel's Proof of Annual Maintenance Payments for HNI Code
4	Non-Disclosure Agreements between Huawei and LigTel (2011)

5	LigTel's Cybersecurity Policies No. 1
6	LigTel's Cybersecurity Policies No. 2
7	LigTel Employee Confidentiality Agreements
8	April 17, 2017 email from Wentworth to Huawei employees, including Mao, re: Capacity Issues
9	June 21, 2019 email from Brown to Wentworth re Contact Info.
10	June 26, 2019 email from Brown to Wentworth re Sandhills Wireless in Huawei Unit
11	Photos of Baicells SIM cards
12	July 3, 2019 Letter from LigTel to Sandhills Granting Limited Right to Use LigTel's HNI code
13	July 31, 2019 Email and Letter from LigTel to Sandhills Extending the Limited Right to Use
14	August 21, 2019 Letter LigTel sent to Goode at ATIS re Baicells's Use of LigTel HNI Code
15	Baicells's migration plan progress report to ATIS from March 2020.
16	Non-Disclosure Agreements between Huawei and LigTel (2010)